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THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHANEL, INC., a New York corporation, Plaintiff, v. VERONIQUE IDEA CORP., a New York corporation, d/b/a VERONIQUE IDEA CORPORATION, and JONG EUN PARK a/k/a DANIEL PARK, an individual, d/b/a VERONIQUE IDEA CORPORATION, and DOES 1-10, Defendants.	Case No. 10-cv-2587-VM **PLAINTIFF'S NOTICE OF MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that pursuant to Rule 56 of the Federal Rules of Civil Procedure, plaintiff, Chanel, Inc. hereby moves for summary judgment in its favor on the grounds that there is no genuine issue as to any material fact and, therefore, Plaintiff is entitled to judgment as a matter of law against Defendants Veronique Idea Corp., a New York corporation, d/b/a Veronique Idea Corporation, and Jong Eun Park, an individual, d/b/a Veronique Idea Corporation, on all claims asserted in the Complaint.

In support of this motion, Plaintiff submits the following:

1. Statement of Undisputed Material Facts;
2. Declaration of Adrienne Hahn Sisbarro;
3. True and correct copy of Chanel's federal trademark registration;
4. Declaration of Elizabeth Elfeld;
5. Excerpts of the Deposition of Jong Eun Park, conducted October 26, 2010 together with the Exhibits marked during the deposition;
6. Declaration of Stephen M. Gaffigan; and
7. Memorandum of Law.

Motion papers shall be filed promptly after service.

Any opposition to this Motion shall be served on or before January 25, 2011, and the reply papers, if any, shall be served on or before February 4, 2011, as ordered in the Court's Order, dated December 6, 2010 (DE 22) establishing a briefing schedule in connection with Plaintiff's Motion for Summary Judgment.

Parties may request oral argument by letter at the time their moving or opposing or reply papers are filed. The Court will determine whether argument will be heard and, if so, will advise counsel of the argument date.

Courtesy copies of pleadings, marked as such, shall be submitted to chambers, as soon as practicable after filing.

Dated this 5th day of January, 2011.

Respectfully submitted,

GIBNEY, ANTHONY & FLAHERTY LLP

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